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November 19, 2024

VIA ECF

The Honorable Jessica G. L. Clarke
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Courtroom 20C
New York, NY 10007-1312

Re: *Doe v. Black*, No. 1:23-cv-06418-JGLC – Letter-Motion for Extension of Time

Dear Judge Clarke:

We represent defendant Leon Black in this matter. Pursuant to Your Honor’s Individual Rule 2(e), we respectfully request an extension of time of 32 days to answer or otherwise respond to Plaintiff’s First Amended Complaint (ECF Doc. No. 152) (the “FAC”).

As required by Individual Rule 2(e), we state that:

- 1) The original deadline for Mr. Black to answer or otherwise respond to the FAC is Thursday, November 21, 2024, and the requested new deadline is Monday, December 23, 2024.
- 2) There have been no previous requests for adjournment or extension of this deadline;
- 3) The proposed extension is necessary in light of various deadlines in both this case and others in which Defendant’s counsel are involved, conflicts with the schedules of various members of our team, and the upcoming Thanksgiving holiday. The requested extension will not delay discovery or any other deadlines in this case, and the parties intend to proceed with discovery during the extension period;
- 4) Plaintiff’s counsel takes no position on the request; and
- 5) The parties are scheduled to appear before the Court for a case management conference on May 1, 2025.

The Hon. Jessica G. L. Clarke
November 19, 2024

Accordingly, we respectfully request a thirty-two day extension of time, until December 23, 2024, for Mr. Black to answer or otherwise respond to the FAC.

Respectfully submitted,

/s/ E. Danya Perry
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